

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

PRINCETON DIGITAL IMAGE
CORPORATION,

Plaintiff,

v.

HEWLETT PACKARD CO., *et al.*,

Defendants.

Civil Action No. 1:12-cv-00779 (RJS)

DECLARATION OF CHRISTOPHER J. HIGGINS IN SUPPORT OF DEFENDANTS'
REPLY TO MOTION FOR SUMMARY JUDGMENT

I, Christopher Higgins, declare under penalty of perjury that the following is true and correct:

1. I am an attorney at the law firm of Orrick, Herrington & Sutcliffe LLP, counsel for defendant Fujifilm North America Corporation ("FNA"). I have personal knowledge of the facts set forth in this declaration, or access to information and records allowing me to confirm those facts. If called as a witness, I could testify competently to these facts under oath.

2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts of PDIC's Supplemental Disclosure of Asserted Claims and Infringement Contentions Against Defendant Fujifilm North America Corporation sent to FNA by PDIC via email on July 31, 2013.

3. Attached hereto as **Exhibit B** is a true and correct copy of a cover letter from PDIC to Defendants enclosing PDIC production Bates Numbered PDIC0023077-23099. Bates Numbers PDIC0023077-23083 are included in this exhibit and are the Settlement Agreement

between PDIC and Xerox International Partners dated June 28, 2013.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct based on my own personal knowledge.

Executed on June 3, 2014 in Washington, District of Columbia.



Christopher Higgins